

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

MICHAEL J. O'CONNELL, et al.,

Plaintiffs,

v.

PRECISION MECHANICAL, INC., et al.,

Defendants.

Case No. 4:05CV6187A SNL

STIPULATION FOR ENTRY OF CONSENT JUDGMENT

Come now the parties and stipulate as follows:

1. Judgment shall be entered in favor of plaintiffs and against defendants Precision Mechanical, Inc., Robert Blackburn, Sheryl Blackburn and ~~Donald W. Quagge~~ in the amount of \$18,165.05, which consists of \$16,488.87 in delinquent fringe benefit contributions and \$1,676.18 in union dues/assessments owed through July 2005.

2. Execution on the judgment amount set forth in paragraph 1, above, shall be stayed so long as defendants comply with paragraphs 3 and 4, below.

3. Defendants shall make payments to plaintiffs pursuant to the following schedule:

- a) A minimum of \$2,000.00 on or before October 1, 2005;
- b) A minimum of \$2,000.00 on or before November 1, 2005;
- c) A minimum of \$2,000.00 on or before December 1, 2005;
- d) A minimum of \$2,000.00 on or before January 1, 2006; and
- e) The judgment balance on or before February 1, 2006.

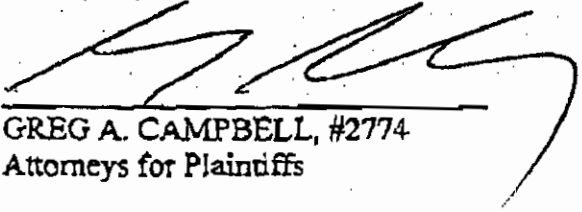
4. Defendants shall submit their reports, fringe benefit contributions and dues for the period of August 2005 and thereafter on or before the date due as set forth in the collective bargaining agreement between defendant and Plumbers and Pipefitters Local 562.

5. If defendants fail to make a payment when due pursuant to paragraph 3 above, or fail to submit their reports and contributions as required by paragraph 4, above, the entire judgment as provided in paragraph 1, less any payments made, shall become immediately due.

6. The parties acknowledge that this Stipulation is based upon unaudited reports submitted by defendants, and that if plaintiffs discover through an audit of defendants' records that additional amounts are owed, then plaintiffs shall be entitled to pursue the collection of such amounts.

WHEREFORE, the parties stipulate to entry of a consent judgment according to the above terms.

DIEKEMPER, HAMMOND, SHINNERS,
TURCOTTE AND LARREW, P.C.
7730 Carondelet, Suite 200
St. Louis, Missouri 63105
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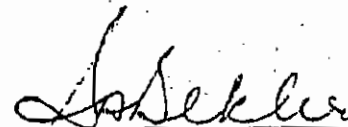

GREG A. CAMPBELL, #2774
Attorneys for Plaintiffs

PRECISION MECHANICAL, INC.

By: _____


Printed Name: Robert Blackburn


ROBERT BLACKBURN


SHERYL BLACKBURN

~~RECEIVED~~

SO ORDERED:


UNITED STATES DISTRICT JUDGE

Dated: 10/27/05